

Appendix C3 – Letter Regarding Phase I ESA Findings and Recommendations

3 May 2022

Smith Development Group
c/o Mr. Lund Smith
682 Villa Street, Suite G
Mountain View, California 94041

Subject: Letter Regarding Phase I ESA Findings and Recommendations;
Proposed Development, Grant-Sherman-Park, Palo Alto, California

Dear Mr. Smith:

EKI Environment & Water, Inc. (EKI) is pleased to present to Smith Development Group (Smith Development) this letter that responds to the City of Palo Alto's request for additional information related to the Phase I Environmental Site Assessment (ESA) reports prepared by EKI for the following properties: 150 Grant Avenue, 123 Sherman Avenue, and 2501 Park Boulevard in Palo Alto, California (collectively, the Site). Smith Development intends to redevelop the Site into commercial uses.

The Phase I ESAs identified the California-Olive-Emerson (COE) regional groundwater volatile organic compound (VOC) plume as a Recognized Environmental Condition (REC) for the Site. Vapor sampling conducted at the Site by EKI identified the presence of certain VOCs in soil vapor, with one location containing tetrachloroethylene (PCE) at a concentration above the current regulatory agency screening level for commercial land use. The Phase I ESA reports did not provide recommendations for any follow-on (e.g., Phase II sampling).

Based on the preliminary development plan provided by Smith Development, and actions to be taken by Smith Development as part of planning for and implementation of Site redevelopment (discussed below), EKI's opinion is that no additional Phase II investigations are warranted or recommended. EKI understands Smith Development will implement the following actions related to the Site development, which are designed to further characterize soil and groundwater conditions at the Site, and mitigate potential impacts to human health and the environment at the Site:

- Smith Development plans to enter into a voluntary agreement with the Santa Clara County Department of Environmental Health (SCCDEH) Site Cleanup Program (SCP) that will oversee (e.g., review and approve) the design, installation, and post-development operation and maintenance (O&M) of a vapor intrusion mitigation system (VIMS) designed to mitigate the intrusion of VOC vapors from the COE groundwater plume into indoor air at the Site. Following completion of Site

development and any required monitoring, the SCCDEH will provide a letter to Smith Development that residual groundwater contamination at the Site does not pose a continuing threat to groundwater resources, human health, or the environment.

- Smith Development will perform pre-characterization of soils in the area of the planned sub-grade parking garage, e.g., drilling of boreholes on a grid, sampling and analysis of soil samples to the planned excavation depth, in order to obtain pre-approval from a landfill for acceptance of the soils, which will allow for direct loading of the soils onto trucks for off-site disposal at an appropriately-permitted facility.
- Smith Development will prepare a Soil Management Plan (SMP) that will provide protocols, e.g., mitigation measures, that will be implemented during earthwork activities at the Site to minimize the potential for exposure to chemicals of concern present in soil and groundwater beneath the Site and identify appropriate soil handling and disposal requirements. The SMP will also provide protocols for long-term measures that may be required to mitigate the potential for intrusion of VOC vapors from the subsurface into indoor air.
- Given that short-term construction dewatering of groundwater potentially containing VOCs will be performed during excavation and construction of the sub-grade parking garage, Smith Development will prepare a dewatering management and disposal plan. The plan will prescribe measures for proper handling of the groundwater and pre-treatment necessary, based on discharge sampling and pump testing, prior to discharge of extracted groundwater to either the storm drain or sanitary sewer under permit.

We are pleased to have the opportunity to continue working with you on this project. Please call if you have any questions or wish to discuss this letter in greater detail.

Very truly yours,

EKI ENVIRONMENT & WATER, INC.



Paul B. HOFFEY
Principal